

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

**In re:**

**LECLAIRRYAN PLLC,**

**Debtor.**

**Chapter 7**

**Case No. 19-34574 (KRH)**

**STIPULATION AND ORDER**

COMES NOW Woods Rogers PLC, counsel or prospective counsel for approximately thirty individual former attorneys, a list that has been provided to counsel (collectively, the “Defendants”) of LeClair Ryan, A Professional Corporation or LeClairRyan PLLC (collectively, the “Debtor”) and Lynn L. Tavenner as Chapter 7 Trustee (the “Trustee”), by counsel, and stipulate and agree as follows:

1. The Trustee mailed demand letters to the Defendants (the “Demand Letters”), among other former attorneys of the Debtor, requiring that the Defendants make a Pre-Complaint Mediation Election within 14 days of the date of the Demand Letters.

2. Due to the holidays and other delays, most of the Defendants did not actually receive the Demand Letters until a few days before or a few days after Thanksgiving Day. Several Defendants have not received the Demand Letters as of the date of this Stipulation.

Michael E. Hastings (VSB No. 36090)  
Woods Rogers PLC  
901 East Byrd Street, Suite 1550  
Richmond, Virginia 23219  
T: 804-956-2049  
M: 540-798-8133  
e-mail: [mhastings@wtpplaw.com](mailto:mhastings@wtpplaw.com)

3. Woods Rogers PLC has undertaken the representation of many of the Defendants, is currently in the process of being engaged by certain of the Defendants, and certain of the Defendants are considering the engagement of Woods Rogers PLC.

4. To provide sufficient time to decide whether to elect to participate in pre-complaint mediation, the Defendants have requested an extension of the time to make the elections. While the Trustee maintains that she does not have the authority to grant such an extension, given the delay in receipt of the demand letter, the Trustee has indicated that she does not object to such an extension should the Court determine one is warranted.

5. Therefore, the Defendants have requested, and the Trustee has not opposed, that the Parties stipulate to an extension of time for the Defendants to make the Pre-Complaint Mediation Election to December 14, 2021.

6. The Parties have not previously stipulated to an extension of the deadline to make the Pre-Complaint.

7. The Parties therefore stipulate that Defendants shall make the Pre-Complaint Mediation Election on or before December 14, 2021.

Dec 16 2020

/s/ Kevin R Huennekens

UNITED STATES BANKRUPTCY JUDGE

Entered on Docket Dec 16 2020

WE ASK FOR THIS:

/s/ Michael E. Hastings

Michael E. Hastings (VSB No. 36090)  
Woods Rogers PLC  
901 East Byrd Street, Suite 1550  
Richmond, Virginia 23219  
T: 804-956-2049  
M: 540-798-8133  
e-mail: [mhastings@wtplaw.com](mailto:mhastings@wtplaw.com)

SEEN AND NOT OPPOSED:

/s/ Britany J. Nelson

Erika L. Morabito (VSB No. 44369)  
Brittany J. Nelson (VSB No. 81734)  
FOLEY & LARDNER LLP  
3000 K Street, NW, Suite 600  
Washington, DC 20007-5109  
Telephone: (202) 672-5300  
Facsimile: (202) 672-5399  
E-mail: [emorabito@foley.com](mailto:emorabito@foley.com)  
[bnelson@foley.com](mailto:bnelson@foley.com)

Local Rule 9022-1(C) Certification

The foregoing Order was endorsed by and/or served upon all necessary parties pursuant to Local Rule 9022-1(C).

/s/ Michael E. Hastings

Michael E. Hastings

Michael E. Hastings (VSB No. 36090)  
Woods Rogers PLC  
901 East Byrd Street, Suite 1550  
Richmond, Virginia 23219  
T: 804-956-2049  
M: 540-798-8133  
e-mail: [mhastings@wtplaw.com](mailto:mhastings@wtplaw.com)

